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Federal Communications Commission
Office of the Secretary

WESTINGHOUSE BROADCASTING COMPANY, INC.
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(202) 508-4470

STEPHEN A. HILDEBRANDT
Chief Counsel

July 6, 1992

Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

ORIGINAL
FILE

Re: Westinghouse Broadcasting Company Inc.'s Reply Comments
in ET Docket No. 92-9

Dear Ms. Searcy:

Enclosed for filing with the Commission is an original and nine (9) copies of Westinghouse Broadcasting Company, Inc.'s (Group W) Reply Comments regarding Redevelopment of Spectrum to Encourage Innovation In the Use Of New Telecommunications Technologies, ET Docket No. 92-9.

Should there be any questions in connection with these Comments, please feel free to contact the undersigned.

Respectfully submitted,

A handwritten signature in cursive script that reads "SA Hildebrandt".

Stephen A. Hildebrandt, Esq.
Chief Counsel

Enclosures

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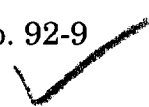
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**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554**

Federal Communications Commission
Office of the Secretary

In the Matter of:)
)
Redevelopment of Spectrum to Encourage)
Innovation in the Use of New)
Telecommunications Technologies)

ET Docket No. 92-9



**REPLY COMMENTS OF
WESTINGHOUSE BROADCASTING COMPANY, INC.**

Westinghouse Broadcasting Company, Inc. ("Group W") hereby files its Reply Comments to Comments filed by Motorola Inc. in the above-captioned proceeding. Group W is the owner of five (5) major market television stations¹ and is particularly interested in maintaining the 1.99 - 2.11 GHz band for broadcast auxiliary services, for its television Electronic News Gathering (ENG) services. In fact, virtually every VHF television station in the nation's top 50 television markets employs ENG services as an integral part of their local news coverage. Use of the 2 GHz spectrum for ENG services is essential to the operation of this service because of the reliability and effectiveness of this band. Only by utilizing these reliable microwave frequencies can television stations provide ENG coverage and thereby effectively serve the public by transmitting live reports or providing on-the-spot emergency coverage and information to viewers. Any proposed reallocation of spectrum is contrary to the Commission's established interest

¹ KDKA-TV, Pittsburgh, Pennsylvania; KPIX, San Francisco, California ; KYW-TV, Philadelphia, Pennsylvania; WBZ-TV, Boston, Massachusetts; WJZ-TV, Baltimore, Maryland.

in promoting spectrum efficiency by using types of spectrum that cannot accommodate fiber or cable facilities.

Broadcasters' primary use of the 2 GHz band is for mobile and portable ENG services, rather than fixed point-to point operation. ENG service is unique in that it is inherently portable and mobile, utilizes mobile, rather than fixed links, and as such requires the long path lengths (sometimes 50 miles or more) that is possible only by using the 2 GHz band. This is especially true in airborne and marine ENG applications.

While Group W agrees with Motorola's view that Personal Communication Services is an important emerging technology and should be encouraged to develop, it believes that Motorola offers unsuitable and ineffective solutions to the problem of accommodation of incumbent and new users in the 2 GHz band.

I. Motorola's Arguments For Alternative Accommodations For Incumbent Users Are Unacceptable

Motorola has advanced several arguments for accommodation of this spectrum for PCS and other emerging technologies. One proposal is to relocate broadcast users to spectrum above 3 GHz or to alternative media. This suggestion is simply unfeasible because of ENG's requirement of long path lengths discussed above. Additionally, ENG operations are most effectively and reliably discharged on the microwave frequencies of the 2 GHz spectrum, and because of its portable/mobile nature, private operational fixed or common carrier service is incompatible with ENG's unique needs. **There are no other suitable frequencies for displaced broadcasters to move to in order to continue to provide this important mobile and portable news gathering service.** The related proposal to provide displaced incumbents with full compensation for relocation to alternative bands is

irrelevant when such users have no alternative spectrum from which to operate.

Group W agrees with Motorola that spectrum sharing is an unacceptable solution. Any attempt to share this spectrum would have disastrous consequences for day-to-day ENG operations in local television markets. Because ENG microwave operations are inherently mobile and/or portable, they cannot use fixed point-to-point link techniques for frequency coordination. Mobile use is incompatible with fixed use. Furthermore, spectrum sharing has traditionally not been a practical alternative between fixed and mobile users, either in the long or short term.

Nor are compression techniques, supported by Motorola, an acceptable method of sharing spectrum. For one reason, to date no such effective technology exists. It would be unwise and contrary to the public interest to rely on undeveloped technology in formulating as important a decision as accommodation of the broadcast auxiliary service. Such compression techniques should first be developed before plans for implementation should be made. For another reason, when or if compression technology is developed, the reserved spectrum will be needed for HDTV service, broadcasting's **new technology**.

II. Other Unsuitable Alternatives

Cable, fiber, and satellite services are not feasible alternatives for ENG operation. These services are unreliable in disasters and are often cost prohibitive. The use of satellite services as an alternative to terrestrial ENG links, for example, would require stations to incur enormous expenses. Many realities support this conclusions, including:

1. Virtually every VHF television station in the top 50 television markets nationwide uses ENG as an integral part of their local news

coverage. There is simply not enough satellite spectrum available for them all to exist.

2. Even if spectrum were available, the use of satellite would not be cost-effective to a news operation. For example, the approximate cost of an ENG vehicle is \$130,000, while the approximate cost of a satellite truck is \$500,000. Proportionate costs would have to be incurred for personnel and maintenance of satellite ENG equipment, as opposed to standard ENG equipment.
3. Leasing satellite segment for ENG services is cost-prohibitive for most stations, and requires on-going, substantial costs for each use. On the other hand, utilization of the standard ENG equipment requires a one-time investment, and no on-going expense for each use.

Requiring stations to incur these enormous expenses might prohibit them from furnishing important or possible life-saving information to the public or alerting them of disasters or other public emergencies where public safety is at issue.

Other bands are also not effective alternatives for ENG services. The Commission has previously considered and rejected the broadcast auxiliary bands for PCS use. That rejection must stand until proven and cost-effective solutions for the unique needs and problems of ENG are demonstrated. Many major market stations have already shifted their STLs to higher bands in order to permit sole use of the 2 GHz for ENG services without fear of interference or limitation with fixed links.

CONCLUSION

Group W supports and encourages the growth of emerging technologies such as PCS. However, the benefits of these technologies should not be achieved at the expense of ENG services, which have been proven to benefit and serve the public welfare. Spectrum availability is the key issue in this matter, so it is therefore the responsibility of proposed and incumbent users of the spectrum to consider all reasonable methods of relocation and other

alternatives. Group W's experience has shown, however, that important ENG service can be effectively rendered only by use of the 2 GHz band. If and when other viable alternatives are developed, such as use of less bandwidth or higher frequencies, to successfully accommodate ENG within reasonable costs and limits, Group W will eagerly take advantage of these methods in the spirit of advancing new technologies.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "SA Hildebrandt", written in a cursive style.

Stephen A. Hildebrandt
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July 6, 1992

CERTIFICATE OF SERVICE

I hereby certify that on this 6th day of July, 1992, I caused copies of the foregoing "Reply Comments of Westinghouse Broadcasting Company, Inc.", ET Docket No. 92-2, to be mailed via first class, postage prepaid, to the following:

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